

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

In the Matter of L.C.	)	
	)	
SEBASTIAN CORREA MORALES	)	Case No. 1:24-cv-07951
	)	
Petitioner,	)	
	)	<b><u>PETITIONER'S PROPOSED</u></b>
vs.	)	<b><u>EXHIBIT LIST</u></b>
	)	
JULIANA ESCOBAR RESTREPO,	)	
	)	
Respondent.	)	
	)	

**The Convention on the Civil Aspects of International Child Abduction, done at The Hague on October 25, 1980; International Child Abduction Remedies Act, 22 U.S.C. 9001 *et seq.***

Petitioner, Sebastian Correa Morales (“Petitioner”), by and through his undersigned counsel, hereby submits the following Proposed Exhibit List, in connection with the trial scheduled for February 24 and 26, 2025, in the above-captioned matter.

Petitioner reserves all rights to amend and/or supplement this disclosure for any reason, including without limitation, in response to Respondent’s Exhibit list and Witness list, to respond to or rebut any argument or factual allegation made by Respondent or her witnesses, to impeach a witness, or to cure an inadvertent omission.

Number	Document Name	Objection	Date Admitted
P1	Respondent's Colombian Identification Card		
P2	Child's Colombian Civil Registry		
P3	Child's Colombian Passport		
P4	Photos of Child's Life in Colombia	FRE 401, 402	

P5	Registration Form for Child's 2024 Enrollment at Semillitas School in Colombia	FRE 401, 402	
P6	Child's Health Insurance 2021-2024 in Colombia, dated August 21, 2024	FRE 401, 402	
P7	Travel Authorization Form, dated January 23, 2024		
P8	Child's Medical Certificate in Colombia, dated January 24, 2024	FRE 401, 402	
P9	Return Flight Confirmation for Respondent and Child to Colombia on May 16, 2024		
P10	Correspondence between Petitioner and Child's School in Colombia re Payment for January 2024, dated January 9, 2024	FRE 401, 402, and no notice given	
P11	Correspondence between Parties re Colombian Health Insurance, dated February 6, 2024	FRE 401, 402, and no notice given	
P12	Audio Recording from Respondent re Insurance in Colombia, dated February 6, 2024	FRE 401, 402, and no notice given	
P13	Transcript of audio recording of Respondent re insurance in Colombia, dated February 6, 2024	FRE 401, 402, and no notice given	
P14	Petitioner's Affidavit in Response Filed in Queens Family Court, dated September 4, 2024	FRE 801-803 Self-serving prior statement	
P15	Petitioner's Attorney Affirmation in Queens Family Court, dated September 5, 2024	FRE 801-803 self-serving prior statement	
P16	Respondent's Affidavit in Queens Court Custody Proceeding, dated September 9, 2024		
P17	Respondent's Reply to Petitioner's Affirmation in Queens Court Custody Proceeding, dated September 9, 2024		

P18	Petitioner's Sur Reply in Queens Family Court Proceeding, dated September 25, 2024	FRE 801-803 Self-serving prior statement	
P19	New York State Family Court Order of Dismissal, dated September 30, 2024	Objection raised in MIL	
P20	Respondent's Interrogatories Response		
P21	Respondent's Request for Admissions Response		
P22	Respondent's Verification for Interrogatory and Request for Admission Responses		

Petitioner reserves the right to supplement the above list with additional exhibits before or during trial, including but not limited to, the right to submit rebuttal evidence as necessary.

Dated: January 23, 2025

Respectfully submitted,

/s/ Richard Min

Richard Min

Michael Banuchis

Green Kaminer Min & Rockmore LLP

420 Lexington Avenue, Suite 2821

New York, New York 10170

Telephone: (212) 681-6400

Fax: (212) 681-6999

rmin@gkmrlaw.com

mbanuchis@gkmrlaw.com

*Of Attorneys for Petitioner,  
Sebastian Correa Morales*